From: Paul Argyropoulos

To: <u>dunham.sarah@epa.gov</u>; <u>Paul Machiele</u>; <u>Christopher Grundler</u>; <u>Laughlin.Karen@epamail.epa.gov</u>;

simon.karl@epa.gov; John Weihrauch; Robert Larson; Maureen Delaney; John Hannon; Roland Dubois

Cc: <u>stewart.lori@epa.gov</u>

Subject: Initial Thoughts for NSC Discussion

Date: 01/06/2010 12:47 PM

Importance: High

meetina

To get things moving in prep for tomorrow discussion with Margo and prep for pre-brief for Friday's NSC

General thought is to run thru RFS2 nuts and bolts briefing and then incorporate issues / areas of interest with focus on international areas of interest in the rule and reactions. The following are my initial thoughts on the key areas that should be covered:

Key international areas of interest

Biomass / Feedstock Requirements

US ag / crops - Aggregate compliance with trigger and opt for ind record keeping or consortium

- o Int'l ind or consortium based record keeping and map and track (with option for aggregate if county can provide sufficient data to support aggregate compliance)
- US and Int'l Forest / non ag sector record keeping map and track or consortium

Grandfathering of Facilities for General Total Renewable Fuel Category Applies

Applying LCA assessment results to all domestic and foreign produced fuels of same feedstock/process/fuel pathways we have currently modeled

o Also notation about petition process etc.

Registration requirements – same except for posting a bond. Similar as done in previous fuel programs.

Other thoughts, issues, ideas?

Paul N. Argyropoulos Senior Policy Advisor Office of Transportation & Air Quality US Environmental Protection Agency Office Phone: 1-202-564-1123

Mobile: 202-577-9354

Email: argyropoulos.paul@epa.gov

Website: www.epa.gov/otaq